

February 22, 2012
Via US ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: TeleQuality Communications, Inc.
Form 499 Filer ID: 826402
Annual Customer Proprietary Network Information Compliance Certification;
EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of TeleQuality Communications, Inc..

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Please do not hesitate to contact me at 407-260-1011 or mark@csilongwood.com if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,



Mark G. Lammert, CPA
Tax Preparer for TeleQuality Communications, Inc.

cc: TeleQuality Communications, Inc.
file: TeleQuality Communications, Inc.— PUC - FCC

**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is TeleQuality Communications, Inc. (hereafter referred to as "TeleQuality, Inc.") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. TeleQuality, Inc. follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or TeleQuality, Inc.. However, TeleQuality, Inc. cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, TeleQuality, Inc. shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - B. TeleQuality, Inc. shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, TeleQuality, Inc. shall not wait the additional seven (7) days to notify its customers if TeleQuality, Inc. determines there is an immediate risk of irreparable harm to the customers.
 - D. TeleQuality, Inc. shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
 - A. Specifically, TeleQuality, Inc. shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 1. When the customer has pre-established a password.
 2. When the information requested by the customer is to be sent to the customer's address of record, or
 3. When TeleQuality, Inc. calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

B. TeleQuality, Inc. may use CPNI for the following purposes:

- To initiate, render, maintain, repair, bill and collect for services;
- To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
- To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
- To market additional services to customers that are within the same categories of service to which the customer already subscribes;
- To market services formerly known as adjunct-to-basic services; and
- To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.

4. Prior to allowing access to Customers' individually identifiable CPNI to TeleQuality, Inc.'s joint venturers or independent contractors, TeleQuality, Inc. will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, TeleQuality, Inc. requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
5. TeleQuality, Inc. requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
6. TeleQuality, Inc. does not market, share or otherwise sell CPNI information to any third party.
7. TeleQuality, Inc. maintains a record of its own and its affiliates' sales and marketing campaigns that use TeleQuality, Inc.'s customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

A. Prior commencement of a sales or marketing campaign that utilizes CPNI, TeleQuality, Inc. establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by TeleQuality, Inc..

- Prior to any solicitation for customer approval, TeleQuality, Inc. will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- TeleQuality, Inc. will use opt-in approval for any instance in which TeleQuality, Inc. must obtain customer approval prior to using, disclosing, or permitting access to CPNI.